

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 22 C 3639
)	
CHICAGO BASEBALL HOLDINGS, LLC;)	Judge Pacold
WRIGLEY FIELD HOLDINGS, LLC; WF)	
MASTER TENANT, LLC; and CHICAGO)	Magistrate Judge McShain
CUBS BASEBALL CLUB, LLC,)	
)	
Defendants.)	

JOINT STATUS REPORT

The parties, by their undersigned attorneys, submit this joint status report in accordance with the court's minute entry of September 19, 2023 (Dkt. 34):

(a) Progress of fact discovery: Review of the documents produced by the defendants and subpoenaed third parties remains ongoing. The United States has received an initial document production from the City of Chicago in response to its recent subpoena to the Mayor's Office for People with Disabilities (which it has shared with the defendants), and the defendants are working to obtain additional documents from the City pursuant to their recent subpoena as well. The defendants are also working to issue a supplemental document production, to supplement their written discovery responses, and to provide a privilege log. Within the next week, the United States will ask the defendants for dates to depose certain fact witnesses and will also issue a deposition notice under Fed. R. Civ. P. 30(b)(6). The deadline to complete fact discovery is December 22, 2023. Dkt. 32.

(b) Status of settlement discussions: The parties are not currently engaged in settlement discussions and do not request a settlement conference at this time. The parties will notify the

court in the future if a settlement conference would be productive.

(c) Other matters: The parties do not have additional items to raise with the court at this time.

Respectfully submitted,

For the United States:

MORRIS PASQUAL
Acting United States Attorney

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